



ANTI-BRIBERY POLICY

INTRODUCTION

Wyke Printers strives at all times to uphold responsible and fair business practices. The Company therefore has a zero tolerance policy towards bribery and corruption and is committed to acting fairly and with integrity in all of its business dealings and relationships and implementing and enforcing effective systems to counter bribery.

This policy applies to all permanent and temporary employees of the company as well as any associates of the company, who are also expected to adhere to it.

The Bribery Act 2010

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

It is an offence in the UK to:

- offer, promise or give a financial or other advantage to another person (i.e. bribe a person), whether within the UK or abroad, with the intention of inducing or rewarding improper conduct
- request, agree to receive or accept a financial or other advantage (i.e. receive a bribe) for or in relation to improper conduct
- bribe a foreign public official.

You can be held personally liable for any such offence.

It is also an offence in the UK for an employee or an associate to bribe another person in the course of doing business intending either to obtain or retain business, or to obtain or retain an advantage in the conduct of business, for the Company. The Company can be liable for this offence where it has failed to prevent such bribery by associated persons. As well as an unlimited fine, it could suffer substantial reputational damage.

Policy statement

All employees and associated persons are required to:

- comply with the Bribery Act 2010
- act honestly, responsibly and with integrity
- operate in an ethical, professional and lawful manner at all times.

Bribery of any kind is strictly prohibited. Under no circumstances should any provision be made, money set aside or accounts created for the purposes of facilitating the payment or receipt of a bribe.

If in doubt as to what might amount to bribery or what might constitute a breach of this policy, refer the matter to your line manager.



The giving of business gifts to clients, customers, contractors and suppliers is not prohibited provided the following requirements are met:

- the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage
- it complies with local laws
- it is given in the company's name, not in the giver's personal name
- it does not include cash
- it is of an appropriate and reasonable type and value and given at an appropriate time
- it is given openly, not secretly
- it is approved in advance by a director of the company.

Any payment or gift to a public official or other person to secure or accelerate the prompt or proper performance of a routine government procedure or process, otherwise known as a "facilitation payment", is also strictly prohibited. Facilitation payments are not commonly paid in the UK but they are common in some other jurisdictions.

Responsibilities and reporting procedure

It is the duty and responsibility of all employees and associated persons to take whatever reasonable steps are necessary to ensure compliance with this Policy and to prevent, detect and report any suspected bribery or corruption.

The company encourages all employees and associated persons to be vigilant and to report any unlawful conduct, suspicions or concerns promptly and without undue delay so that investigation may proceed and any action can be taken. Confidentiality will be maintained during the investigation to the extent that this is practical and appropriate in the circumstances. The Company is committed to taking appropriate action against bribery and corruption.

Sanctions for breach

A breach of any of the provisions of this policy will constitute a disciplinary offence and will be dealt with in accordance with disciplinary procedures. Depending on the gravity of the offence, it may be treated as gross misconduct and could render the employee liable to summary dismissal.

As far as associates are concerned, a breach of this Policy could lead to the suspension or termination of any relevant contract, sub-contract or other agreement.



Training

The Company will provide training to all employees to help them understand their duties and responsibilities under this policy.

**This policy is the responsibility of Nick Dominey
Reviewed annually
September 2011**